

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SANDRA ALTIERI, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

REBOOK INTERNATIONAL, LTD.,

Defendant.

No. 4:10-CV-11977-FDS

COURTNEY SCHWARTZ and CHERYL
HARDY, Individually and On Behalf of All
Others Similarly Situated,

Plaintiffs,

v.

REEBOK INTERNATIONAL, LTD.,

Defendant.

No. 1:10-CV-12018-FDS

**PLAINTIFFS ALTIERI, HARDY, AND SCHWARTZ'S MOTION
FOR ENTRY OF PRE-TRIAL ORDER NO. 1 TO CONSOLIDATE
RELATED ACTIONS AND APPOINT INTERIM CLASS COUNSEL**

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[Additional counsel appear on signature page.]

Pursuant to Rules 23(g)(3) and 42(a) of the Federal Rules of Civil Procedure, plaintiffs Sandra Altieri, Cheryl Hardy, and Courtney Schwartz (collectively, “Plaintiffs”) respectfully move this Court to enter Plaintiffs’ [Proposed] Pretrial Order No. 1 to Consolidate Related Actions and Appoint Interim Class Counsel (the “Motion”). Plaintiffs request this consolidation and appointment to ensure the efficient and orderly prosecution of these related class action cases and the best possible representation for the proposed Class alleged therein.

This Motion is submitted on behalf of the plaintiffs in *Altieri v. Reebok International, Ltd.*, No. 4:10-CV-11977-FDS (D. Mass., filed Nov. 16, 2010) and *Schwartz v. Reebok International, Ltd.*, No. 1:10-CV-12018-FDS (D. Mass., filed Nov. 22, 2010) and is supported by the Memorandum of Law and the Declaration of Timothy G. Blood, filed contemporaneously herewith, all pleadings and papers filed herein, and such other evidence and argument that may be presented at the hearing.

CERTIFICATION PURSUANT TO LOCAL RULE 7.1(A)(2)

The undersigned counsel certify that they have conferred with counsel for Defendant in a good faith effort to resolve or narrow the issues raised by this Motion, with the following result: Defendant takes no position on the Motion.

Respectfully submitted,

DATED: December 23, 2010

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CERTIFICATE OF SERVICE

I hereby certify that on December 23, 2010, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the Electronic Mail Notice List, and I hereby certify that I have mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the Electronic Mail Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on December 23, 2010.

DATED: December 23, 2010

GILMAN AND PASTOR, LLP

/s/ David Pastor

DAVID PASTOR (BBO#391000)